FILED 7/9/2021 11:50 AM FELICIA PITRE DISTRICT CLERK

Case 3:21-cv-01911-G Document 1-2 Filed 08/17/21 Page 2 of 28 PageID 6 CERTIFIED MAIL

DALLAS CO., TEXAS Connie Jones DEPUTY

	DC-21-08868	
CAUSE NO.		
		191st
JAYNE SPARRER and	§	IN THE JUDICIAL
CHRIS SPARRER,	§	
	§	
Plaintiffs,	§	
ν.	§	DISTRICT COURT OF
	§	
JO-ANN STORES, LLC,	§	
	§	
Defendant.	§	DALLAS COUNTY, TEXAS

#### PLAINTIFFS' ORIGINAL PETITION

COMES NOW JAYNE SPARRER and husband CHRIS SPARRER, hereinafter "Plaintiffs," complaining of JO-ANN STORES, LLC doing business as JOANN FABRIC & CRAFT STORES, hereinafter "Defendant," and would show the Court as follows:

#### DISCOVERY CONTROL PLAN

1. Discovery should be conducted under Level 3 of the Texas Rules of Civil Procedure.

### **TEXAS RULE OF CIVIL PROCEDURE 47**

2. Pursuant to Texas Rule of Civil Procedure 47(c), Plaintiffs seek monetary relief over \$250,000, but not more than \$1,000,000. The damages sought are within the jurisdictional limits of this Court.

#### **PARTIES**

3. The last four digits of Plaintiff Jayne Sparrer's Social Security Number are 0621. The last four digits of Plaintiff Chris Sparrer's Social Security Number are 4468. Plaintiffs are residents of Dallas County, Texas.

4. Defendant JO-ANN STORES, LLC doing business as JOANN FABRIC & CRAFT STORES is a limited liability company doing business in the State of Texas and may be served with process by certified mail, return receipt requested to CT Corporation System, at 1999 Bryan Street, Suite 900, Dallas, Texas 75201, or any other place where it may be found.

### JURISDICTION AND VENUE

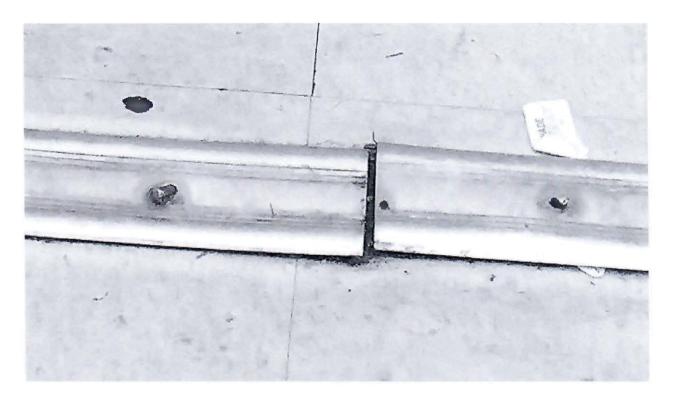
5. The claims asserted arise under the common law of Texas. This Court has jurisdiction and venue is proper because all or a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred in Dallas County, Texas.

#### **FACTS**

- 6. This lawsuit is necessary as a result of personal injuries that Plaintiff Jayne Sparrer sustained on or about November 23, 2019 and for damages sustained by Chris Sparrer as he perceived the injuries to his wife and was there after her fall.
- 7. On November 23, 2019, Plaintiff Jayne Sparrer and Chris Sparrer were injured on the premises located at 11700 Preston Road, #810, Dallas, Texas 75230.
- 8. Defendant was in control of the premises on which Plaintiffs' injuries occurred because, at the time the injuries occurred, Defendant owned and/or operated a retail store on the subject premises doing business as "JOANN Fabric and Craft Store."
- 9. Plaintiffs were invitees at the time the injury occurred. Plaintiffs went on Defendant's premises for the mutual benefit of themselves and Defendant, and at the implied invitation of the Defendant. Defendant extended an open invitation to the public,

including the Plaintiffs, to enter the premises. Plaintiffs entered the premises to shop for goods sold therein.

- 10. Because Plaintiffs were invitees at the time of injury, Defendant owed them a duty to exercise ordinary care to keep the premises in reasonably safe condition, inspect the premises to discover latent defects, and to make safe any defects or give an adequate warning of any dangers.
- 11. Plaintiff Jayne Sparrer's injuries took place in the following manner: Plaintiff and her husband Chris Sparrer entered Defendant's store to shop. While Plaintiff and her husband were standing in line to check out, she felt fatigued. Normally, there are chairs for customers to sit down in while they wait for their turn to check out. On the date of incident, however, there were no such chairs in the checkout area. Plaintiff Jayne Sparrer therefore walked over to an area near the checkout line where she had seen an electric scooter on which she could sit and rest until it was her turn to check out or leave after her husband checked them out. As she walked to the area on which the electric scooter was parked, she tripped on a stud, screw, or rivet sticking out from the metal plate that was loosely attached to the floor. This caused her to trip and fall into the hard floor, injuring her hip and other body parts and aggravating and damaging pre-existing conditions in her body.



As described in greater detail below, Plaintiff Jayne Sparrer sustained serious injuries in this incident. Her husband saw it all and had to endure the injuries to his wife. He also had to terminate a job with he Census Bureau to attend to his wife's needs.

- 12. Defendant's conduct, and that of its agents, servants, and employees, acting within the scope of their employment, constituted a breach of the duty of ordinary care owed by Defendant to Plaintiffs.
- 13. Defendant knew or should have known of the unreasonably dangerous condition and neither corrected nor warned Plaintiffs of it. Plaintiffs did not have any knowledge of the dangerous condition and could not have reasonably been expected to discover it. Defendant either created the condition and/or failed to correct the condition or to warn Plaintiffs about the dangerous condition, which constituted negligence, and such

negligence was the proximate cause of the occurrence in question and resulting injuries to Plaintiffs.

#### DEFENDANT'S LIABILITY

- 14. Plaintiffs would show that, based on the above-described facts, Defendant was negligent. Defendant, as occupier and owner of the premises, with control over the premises, had a duty to inform Plaintiffs of the dangerous condition and make safe the defective condition existing on Defendant's premises.
- 15. Defendant is liable to Plaintiffs under the theories of premises liability and negligence based on the following negligent conduct, among others, to-wit:
  - (a) failure to maintain the premises in a reasonably safe condition;
  - (b) failure to inspect the premises where the dangerous condition existed;
  - (c) failure to correct the condition by taking reasonable measures to safeguard persons who entered the premises;
  - (d) failure to inform Plaintiffs of the dangerous condition existing on the premises; and
  - (e) other acts of deemed negligence.
- 16. Each of these acts and omissions, whether taken singularly or in any combination, was a proximate cause of injuries and damages described below.
- 17. Defendant was also negligent in that it failed to act as a reasonably prudent premise owner would act in the same or similar situation.

#### PLAINTIFF JAYNE SPARRER'S INJURIES AND DAMAGES

- 18. As a direct and proximate result of Defendant's conduct, Plaintiff Jayne Sparrer has suffered serious, disabling, and disfiguring injuries, including a left femur fracture and displaced fracture at the tip of the total hip arthroplasty stem.
- 19. In addition, Plaintiff Jayne Sparrer has suffered severe physical and mental pain, suffering and anguish, and in all reasonable probability, she will continue to suffer in this manner for a long time into the future, if not for the balance of her natural life.
- 20. As a result of the injuries sustained, she has incurred reasonable and customary medical expenses in the amount of at least \$201,409.18.
- 21. There is a reasonable probability that she will incur additional reasonable expenses for necessary medical care in the future.
- 22. Defendant's conduct, as described above, constitutes the type of conduct for which exemplary damages may be recovered in that it was grossly negligent. As a result, Jayne Sparrer seeks exemplary damages in an amount to be determined by the trier of fact.

## PLAINTIFF CHRIS SPARRER'S INJURIES AND DAMAGES

23. Plaintiff Chris Sparrer was with his wife at the time of the incident made the basis of this lawsuit. He was in the zone of danger when he perceived the injuries to her. He also accompanied her to the hospital and provided support, love and affection and companionship to Jayne while she went through the ordeal of surgery, physical therapy and recouperation. He seeks damages for loss of enjoyment, loss of consortium, mental anguish in perceiving this incident and for loss of wage earning capacity.

- 24. As damage recovery: Plaintiff Jayne Sparrer seeks recovery for damages for the following elements of damages, to wit:
  - a) Medical paid in the past;
  - b) Medical expenses in the future;
  - c) Pain in the past;
  - d) Pain in the future;
  - e) Mental suffering in the past;
  - f) Mental suffering in the future;
  - g) Mental anguish in the past;
  - h) Mental anguish in the future;
  - i) Impairment in the past;
  - j) Impairment in the future;
  - k) Disfigurement in the past; and
  - 1) Disfigurement in the future.

As damage recovery: Plaintiff Chris Sparrer seeks recovery for the following elements of damages, to wit:

- a) For loss of consortium in the past;
- b) For loss of consortium in the future;
- c) The recovery for mental anguish in the past;
- d) The recovery for mental anguish in the future; and
- e) A loss of earning capacity.

#### **JURY DEMAND**

25. Plaintiff hereby demands a trial by jury.

#### PRAYER

26. WHEREFORE, premises considered, Plaintiffs pray that the Defendant be served a citation herein, and that Plaintiffs recover damages as hereinabove set forth and such and any and other further relief to which the above may show themselves justly entitled whether in equity or in law, for costs of court, for pre-judgment interest, for post-judgment interest, and for any other damages sustained by them as a result of the incident made the basis of this lawsuit.

Respectfully submitted,

LAW OFFICE OF RALPH C. JONES

/s/ Ralph C. Jones
Ralph C. Jones

Texas Bar No. 10937500

4311 Oak Lawn, Suite 530

Dallas, TX 75219-2315

214-276-6017 - Telephone

214-276-6006 - Facsimile

lawdog@ralphcreddogiones.com

ATTORNEY FOR PLAINTIFFS

## FORM NO. 353-3 - CITATION THE STATE OF TEXAS

JO-ANN STORES, LLC BY SERVING ITS REGISTERED AGENT CT CORPORATION SYSTEM 1999 BRYAN STREET, SUITE 900 DALLAS TX 75201

#### GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the 191st District Court at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being JAYNE SPARRER AND CHRIS SPARRER

Filed in said Court 9th day of July, 2021 against

#### **JO-ANN STORES, LLC**

For Suit, said suit being numbered <u>DC-21-08868</u>, the nature of which demand is as follows: Suit on **OTHER PERSONAL INJURY** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas. Given under my hand and the Seal of said Court at office this 15th day of July, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By <u>Pearshia Zharf</u>, Deputy DEONDRIA GRANT



#### **CERT MAIL**

**CITATION** 

DC-21-08868

JAYNE SPARRER, et al vs.
JO-ANN STORES, LLC

ISSUED THIS 15th day of July, 2021

FELICIA PITRE Clerk District Courts, Dallas County, Texas

By: DEONDRIA GRANT, Deputy

Attorney for Plaintiff
RALPH COLE JONES
ATTN LAW OFFICES RALPH C JONES
4311 OAK LAWN #530
DALLAS TX 75219-2315
214-276-6000
lawdog@ralphcreddogjones.com;

DALLAS COUNTY CONSTABLE
FEES NOT
PAID
PAID

## OFFICER'S RETURN

Case No.: DC-21-08868				·			
Court No.191st District C	ourt						
Style: JAYNE SPARRER	, et al						
vs.							
JO-ANN STORES, LLC							
Came to hand on the	day of	, 20	, at	_ o'clock	M. Executed at _		
within the County of	:	at o'clock	M. on the		day of		
20, by o	delivering to the within name	ed			•		
me in serving such proces	s was miles and n For serving Citation	ny fees are as follows: To co	ertify which with	ess my hand.			
	For mileage	\$	of		County,	<del></del>	
	For Notary	\$	Ву			Deputy	
		(Must be verified if s	served outside the	State of Tex	cas.)		,
Signed and sworn to by th	e said	before me this	day of		, 20	<u>۔</u>	
to certify which witness m	y hand and seal of office.						
			Notary Pul	blic		County	_

### FORM NO. 353-3 - CITATION THE STATE OF TEXAS

**JO-ANN STORES, LLC** BY SERVING ITS REGISTERED AGENT CT CORPORATION SYSTEM 1999 BRYAN STREET, SUITE 900 DALLAS TX 75201

## DALLAS, TEXAS 75:02-4606 608 COMMERCE STACT DISTRICT CLERI

**CERT MAIL** 

**CITATION** 



DC-21-08868

JAYNE SPARRER, et al JO-ANN STORES, LLC

**ISSUED THIS** 15th day of July, 2021

FELICIA PITRE Clerk District Courts. Dallas County, Texas

By: DEONDRIA GRANT, Deputy

**Attorney for Plaintiff RALPH COLE JONES** ATTN LAW OFFICES RALPH C JONES 4311 OAK LAWN #530 DALLAS TX 75219-2315 214-276-6000 lawdog@ralphcreddogjones.com;

#### GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the 191st District Court at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being JAYNE SPARRER AND CHRIS SPARRER

Filed in said Court 9th day of July, 2021 against

JO-ANN STORES, LLC

For Suit, said suit being numbered <u>DC-21-08868</u>, the nature of which demand is as follows: Suit on OTHER PERSONAL INJURY etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas. Given under my hand and the Seal of said Court at office this 15th day of July. 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

Deputy

FEES PAID

DALLAS COUNTY CONSTABLE FEES NOT PAID

**DALLAS, TEXAS 75202-4606** 

erez eo

2021 JUL 28 41 8 43

#### **OFFICER'S RETURN**

Case No.: DC-21-08868 Court No.191st District Court Style: JAYNE SPARRER, et al VS. JO-ANN STORES, LLC Came to hand on the 15 day of JULY \_\_\_\_\_, 20 \_\_21 \_\_\_, at \_\_10 \_\_\_\_ o'clock \_\_\_A \_\_, M. Executed at \_1999 BRYAN STREET SUITE 900 DALLAS TX 75201 , within the County of at 9:04 o'clock , 20 21 , by delivering to the A ...M. on the 21ST day of JULY within named \_JO-ANN STORES LLC BY SERVING ITS REGISTERED AGENT CT CORPORATIONS BY US CERTIFIED MAIL RETURN RECEIPT RECEIVED AND SIGNED BY CHRIS WELLS each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was miles and my fees are as follows: To certify which witness my hand. CHRIS WELLS For serving Citation **\$** 76.00 County, For mileage By DEONDRIA GRANT\_\_\_\_ For Notary (Must be verified if served outside the State of Texas.) Signed and sworn to by the said before me this day of to certify which witness my hand and seal of office. Notary Public \_\_\_ 600 COMMERCE STREET

July 21, 2021

Dear MAIL MAIL:

The following is in response to your request for proof of delivery on your item with the tracking number: 9214 8901 0661 5400 0164 6147 43.

#### Item Details

Status: Delivered

Status Date / Time:July 21, 2021, 9:04 amLocation:DALLAS, TX 75201Postal Product:First-Class Mail®

Extra Services: Certified Mail™

Return Receipt Electronic

Recipient Name: BY SERVING ITS REGISTERED AGENT CT

**CORPORATION S** 

#### Recipient Signature

Signature of Recipient:

Chris Wells

Address of Recipient:

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely, United States Postal Service<sup>®</sup> 475 L'Enfant Plaza SW Washington, D.C. 20260-0004

The customer reference information shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Reference ID: 92148901066154000164614743 DPRO/DC2108868/DG BY SERVING ITS REGISTERED AGENT CT CORPORATION SYSTEM JO-ANN STORES, LLC 1999 Bryan St Ste 900 Dallas, TX 75201-3140

#### CAUSE NO: DC-21-08868

JAYNE SPARRER and	§	IN THE 191 <sup>ST</sup> JUDICIAL
CHRIS SPARRER,	§	
Plaintiffs,	§	
v.	§	DISTRICT COURT OF
	§	
JO-ANN STORES, LLC,	§	
Defendant.	§	DALLAS COUNTY, TEXAS

#### NOTICE OF CHANGE OF FIRM AFFILIATION AND ADDRESS CHANGE

TO ALL PARTIES AND COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Angela M. Buchanan, counsel for Defendant Jo-Ann Stores, LLC, is no longer affiliated with K&L Gates, LLP. All pleadings, notices, correspondence and other documents should be address to her as follows:

Angela M. Buchanan Phillips Murrah P.C. 3710 Rawlins St., Ste. 900 Dallas, Texas 75219 Tel: (469) 485-7341

Facsimile: (214) 434-1370

ambuchanan@phillipsmurrah.com

Dated: August 12, 2021

### Respectfully submitted,

/s/ Angela M. Buchanan

Angela M. Buchanan State Bar No. 24059213 PHILLIPS MURRAH P.C. 3710 Rawlins St., Ste. 900 Dallas, Texas 75219

Tel: (469) 485-7341

Facsimile: (214) 434-1370

ambuchanan@phillipsmurrah.com

ATTORNEY FOR DEFENDANT

#### **CERTIFICATE OF SERVICE**

I hereby certify that on August 12, 2021, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send notification of such filing to all counsel who have entered appearance in this action.

Dated: August 12, 2021 PHILLIPS MURRAH P.C.

/s/ Angela M. Buchanan

Angela M. Buchanan

#### 

### **Automated Certificate of eService**

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Trent Jenkins on behalf of Angela Buchanan Bar No. 24059213 Itjenkins@phillipsmurrah.com Envelope ID: 56247385 Status as of 8/12/2021 11:49 AM CST

#### **Case Contacts**

Name	BarNumber	Email	TimestampSubmitted	Status
Carrol Miller		cmiller@ralphcreddogjones.com	8/12/2021 11:45:39 AM	SENT
Angela M.Buchanan		ambuchanan@phillipsmurrah.com	8/12/2021 11:45:39 AM	SENT
Donna Miller		dlmiller@phillipsmurrah.com	8/12/2021 11:45:39 AM	SENT

Treva Parker-Ayodele DEPUTY

#### CAUSE NO. DC-21-08868

JAYNE SPARRER AND CHRIS SPARRER,	§ 8	IN THE 191 <sup>ST</sup> JUDICIAL
PLAINTIFFS,	8 8 8	
V.	<b>§</b>	DISTRICT COURT OF
JO-ANN STORES, LLC,	§ §	
	§ §	
DEFENDANT.	§	DALLAS COUNTY, TEXAS

#### DEFENDANT JO-ANN STORES, LLC'S GENERAL DENIAL, ORIGINAL ANSWER, AND AFFIRMATIVE DEFENSES

Defendant Jo-Ann Stores, LLC ("Jo-Ann") files this General Denial, Original Answer, and Affirmative Defenses as follows:

#### I. ANSWER & GENERAL DENIAL

1. Pursuant to Texas Rule of Civil Procedure 92, Jo-Ann generally denies each and every allegation contained in Plaintiffs' Original Petition.

#### II. AFFIRMATIVE DEFENSES

- 2. Without waiver, limitation, or prejudice, Jo-Ann asserts the following affirmative defenses to Plaintiffs' claims pursuant to Texas Rule of Civil Procedure 94.
- 3. Jo-Ann asserts the defense of contributory or comparative negligence and alleges that the damages and injuries alleged in Plaintiffs' Original Petition may have been legally and proximately caused in whole or in part by the negligence, fault, negligence per se, and/or other culpable conduct of other persons or parties who failed to exercise the same degree of care and caution as would have been exercised by persons using ordinary care in the same or similar circumstances. Jo-Ann therefore is entitled to have the Court and Jury apply the doctrine of comparative negligence established by Chapter 33 of the Texas Civil Practice & Remedies Code, to reduce any judgment against Jo-Ann by the degree of negligence or fault attributable to any other person or party.
- 4. In the event any settlement is or has been made by any alleged joint tortfeasor, Jo-Ann is entitled to full credit, offset, pro-rata reduction, or percentage reduction, based on the percentage of fault

attributable to each settling person, and Jo-Ann makes known to the other parties and the Court that it will avail itself of its rights under Sections 33.012, 33.015 and 33.016 of the Texas Civil Practice & Remedies Code. Jo-Ann will make its specific reduction at the appropriate time.

5. Jo-Ann further asserts the defense of the failure to mitigate. To the extent that the Plaintiff failed to care for and reduce her own alleged injuries, Jo-Ann is not liable to the Plaintiff.

#### III. JURY DEMAND

6. Jo-Ann requests a trial by jury.

#### IV. PRAYER

For these reasons, Defendant Jo-Ann Stores, LLC asks that the Court enter judgment that Plaintiff take nothing, assess costs against Plaintiff, and award Jo-Ann all such other relief to which it is entitled.

Respectfully submitted,

/s/ Angela M. Buchanan
Angela M. Buchanan
State Bar No. 24059213
PHILLIPS MURRAH P.C.
3710 Rawlins St., Ste. 900
Dallas, Texas 75219

Tel: (469) 485-7341 Facsimile: (214) 434-1370

ambuchanan@phillipsmurrah.com

ATTORNEY FOR DEFENDANT

### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing has been served on all counsel of record pursuant to the Texas Rules of Civil Procedure on this the 13<sup>th</sup> day of August, 2021.

/s/ Angela M. Buchanan Angela M. Buchanan

Judicial Officer

Case Status

**OPEN** 

#### **Case Information**

DC-21-08868 | JAYNE SPARRER, et al vs. JO-ANN STORES, LLC

Case Number Court

DC-21-08868 SLAUGHTER, GENA 191st District Court

File Date Case Type

07/09/2021 OTHER PERSONAL INJURY

**Party** 

**PLAINTIFF** 

Active Attorneys ▼ SPARRER, JAYNE Lead Attorney

JONES, RALPH COLE

Retained

**PLAINTIFF** 

SPARRER, CHRIS

Active Attorneys ▼

Lead Attorney JONES, RALPH COLE

Retained

**DEFENDANT** 

JO-ANN STORES, LLC

## Case 3:21-cy-01911-G Document 1-2 Filed 08/17/21 Page 27 of 28 PageID 31

07/09/2021 NEW CASE FILED (OCA) - CIVIL 07/09/2021 ORIGINAL PETITION ▼ **ORIGINAL PETITION** 07/09/2021 ISSUE CITATION 07/15/2021 CITATION ▼ Served 07/21/2021 **Anticipated Server CERTIFIED MAIL** Anticipated Method **Actual Server CERTIFIED MAIL** Returned 07/28/2021 Comment JO-ANN STORES, LLC 9214 8901 0661 5400 0164 6147 43 07/28/2021 RETURN OF SERVICE ▼ EXECUTED CITATION: JO-ANN STORES, LLC Comment EXECUTED CITATION: JO-ANN STORES, LLC 08/12/2021 NOTICE OF CHANGE OF ADDRESS ▼ NOTICE OF FIRM NAME AND ADDRESS CHANGE Comment AND CHANGE OF FIRM NAME 08/13/2021 ORIGINAL ANSWER - GENERAL DENIAL ▼ ORIGINAL ANSWER

8/16/2021 Details

Case 3:21 cv-01911-G Document 1-2 Filed 08/17/21 Page 28 of 28 PageID 32

SPARRER, JAYNE

Total Financial Assessment \$428.00 Total Payments and Credits \$428.00

7/14/2021 Transaction Assessment \$428.00

7/14/2021 CREDIT CARD - TEXFILE Receipt # 44655-2021-SPARRER, (\$428.00)(DC)

**DCLK JAYNE** 

#### **Documents**

**ORIGINAL PETITION** 

EXECUTED CITATION: JO-ANN STORES, LLC

NOTICE OF FIRM NAME AND ADDRESS CHANGE

**ORIGINAL ANSWER**